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March 28, 2006

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Via ECF

Chief Judge Sue L. Robinson
United States District Court, District of Delaware
844 North King Street
Wilmington, DE 19801

Re: *J-Squared Technologies, Inc. v. Motorola, Inc.*, C.A. No. 04-960-SLR

Dear Judge Robinson:

At the request of Defendant Motorola, Inc., Plaintiffs write to correct an inadvertent factual error contained in their Reply Memorandum in Further Support of Their Motion to Compel. (D.I. 98). In that reply, Plaintiffs stated that: "Beginning Friday afternoon (3:04 MST – not "after business hours" in Phoenix) until the following Wednesday, Motorola was able to review and comment on the proposed Motion." (D.I. 98 at ¶ 4). It has been brought to our attention that the email Ms. Cates received containing the draft motion (attached as Exhibit 1 to Motorola's Answering Memorandum) already accounted for the time difference between Delaware and Phoenix, Arizona. Accordingly, the email was in fact received by Ms. Cates at 5:04 MST, which we are informed through Motorola's Answering Memorandum is after business hours in Phoenix. We apologize for any confusion this error may have caused.

As always, should Your Honor have any questions or concerns about this matter, counsel is available at Your Honor's convenience.

Respectfully,

A handwritten signature in black ink that reads "David A. Felice".

David A. Felice (#4090)

DAF/

cc: William W. Bowser (via ECF)